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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

FREE SPEECH FOUNDATION, INC., an  
Arizona Corporation, and DR. SIMONE  
GOLD, as President of FREE SPEECH  
FOUNDATION, INC.

Plaintiffs,

v.

PHILADELPHIA INDEMNITY  
INSURANCE COMPANY,

Defendant.

Case No. 2:23-cv-01407-MMD-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
PHILADELPHIA INDEMNITY  
INSURANCE COMPANY TO REPLY IN  
SUPPORT OF ITS MOTION TO STAY  
DISCOVERY (ECF No. 11)**

**(First Request)**

IT IS HEREBY STIPULATED by and between Plaintiffs Free Speech Foundation, Inc. and Dr. Simone Gold, (collectively “Plaintiffs”) and Defendant Philadelphia Indemnity Insurance Company (“PIIC” or “Defendant”), by and through their respective counsel, that deadline for PIIC to file a reply in support of its Motion to Stay Discovery (ECF No. 11) shall be extended by seven (7) days, from November 28, 2023, until December 5, 2023.

This extension is being sought because of the need for additional time to prepare the reply due to the intervening Thanksgiving holiday. The parties agree that this brief extension does not prejudice any of their interests nor will it delay the proceedings.

As such, the parties agree there is good cause for this extension.

DATED this 22<sup>nd</sup> day of November 2023

DATED this 22<sup>nd</sup> day of November 2023

CLYDE & CO US LLP

WILEY PETERSEN

By: /s/ Justin S. Hepworth

By: /s/ Jonathan D. Blum

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*Attorney for Plaintiff*

*Attorneys for Defendant Philadelphia  
Indemnity Insurance Company*

**ORDER**

IT IS SO ORDERED.

  
United States Magistrate Judge

Dated: 11/27/2023

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**CERTIFICATE OF SERVICE**

As an employee of Clyde & Co US LLP, I certify that a copy of the foregoing  
**STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT PHILADELPHIA  
INDEMNITY INSURANCE COMPANY TO REPLY IN SUPPORT OF ITS MOTION TO  
STAY DISCOVERY (ECF No. 11) (First Request)** was served by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☒ **BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Registered Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: November 22, 2023

/s/ Rachel Salabak  
An Employee of Clyde & Co US LLP